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November 17, 2017

Solomon Amuno
Nunavut Impact Review Board
Cambridge Bay, NU

Sent via Email: info@nirb.ca

RE: WWF Submission to NIRB Regarding Baffinland's Proposal to Amend the North Baffin Regional Land Use Plan – Mary River Phase 2 Proposal

Dear Solomon Amuno:

WWF Canada appreciates the opportunity to provide comments to the Nunavut Impact Review Board (NIRB) for it and the Nunavut Planning Commission's (NPC) joint review of Baffinland Iron Mines Corp.'s (Baffinland) proposed amendment to the North Baffin Regional Land Use Plan (NBRLUP) for the Mary River Phase 2 Expansion.

WWF is an international conservation organization that was established in 1961. Our mission is to stop the degradation of the planet's natural environment and to build a future in which humans live in harmony with nature by conserving the world's biodiversity, ensuring that the use of natural resources is sustainable, and promoting the reduction of pollution and wasteful consumption. We have contributed to the regulatory processes governing the Mary River Project since 2013 and appreciate this opportunity to provide comment for the NIRB's consideration.

We note that responses provided to the NPC in our October 2, 2017 submission also address points within the NIRB's current comment request; as such we enclose the submission for the NIRB's review and consideration. Many of the comments apply to the current request for input circulated by the NIRB, and we refer to the submission where applicable, in addressing the NIRB's points below.

Regarding the NIRB's request for comment on the adequacy of information provided regarding the possible environmental and socio-economic impacts of the proposed development of the transportation corridor and associated works and activities, WWF would direct the NIRB's attention to the enclosed submission. With regard to specific information gaps and deficiencies noted in the amendment application, WWF suggests that impacts of a railway to the barren ground caribou of Baffin Island are not well understood and therefore require additional information and consideration. Since a transportation corridor, if approved, would persist for years to come and may include various modes of transportation, the impacts to caribou must be considered more deeply, especially noting that as the herd is currently experiencing low abundance, additional linear infrastructure and the cumulative impacts of their use may prevent a fulsome rebound of population numbers, which again, must be studied in greater detail. Further, the impacts of shipping during "shoulder" seasons and specifically, impacts to ice formation, marine mammal migration, and hunter and traveller use of early ice must be considered in further detail. Given the importance of marine mammals and marine travel to Inuit and

community users, it is essential that this information be included for consideration in assessment of the transportation corridor application.

WWF's enclosed submission to the NPC provides information relating to the consideration of alternatives to the proposed routing of the transportation corridor.

While our October 2, 2017 submission did not speak to the level of information provided regarding the suitability of the proposed corridor for the inclusion of additional communication and transportation initiatives, including its environmental, socio-economic and terrain engineering consequences and the potential cumulative impacts of the project; it is our position that given the limited scope of the activities associated with the current amendment application, the inclusion of additional initiatives have not been adequately considered and these should not be allowed through the current amendment process.

In addition, WWF is of the opinion that the proposed corridor, as a linear project, has the potential to negatively impact on important fish and wildlife harvesting areas, and that additional information should be garnered on this issue from community users, including those from Arctic Bay. The proposed corridor has the potential to negatively impact key habitat for fish and wildlife species, especially areas used by threatened species including caribou. WWF also suggests that NIRB, NPC and BIMC clarify how the protections provided for by the recently designated Tallurutiup Imanga National Marine Conservation Area may impact on future use of the area.

In respect to impacts on areas of high scenic, historic, cultural and archaeological value, while WWF has no specific comment on impacts to these components, we do recommend, based on prior interventions by the Qikiqtani Inuit Association and Mittimitaalik Hunters and Trappers Organization, that further work be undertaken to understand if and how these areas may be negatively impacted by the amendment and, where necessary, to develop adequate mitigation measures.

WWF thanks the NIRB for this opportunity to contribute to its consideration of BIMC's Phase 2 application to amend the North Baffin Regional Land Use Plan. Should you have any questions with respect to our submission, please contact me directly at adumbrille@wwfcanada.org.

Sincerely,



Andrew Dumbrille
Senior Specialist, Sustainable Shipping
WWF Canada

Enclosed: WWF Submission to NPC – October 2, 2017

